

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Vincent Lamar Clark

Case No.

Case: 2:21-mj-30068  
Assigned To : Unassigned  
Assign. Date : 2/9/2021  
Description: USA V. VINCENT  
LAMAR CLARK (CMP)(MEV)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 29, 2020 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in possession of a firearm

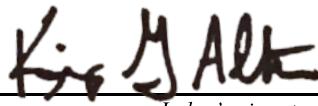
This criminal complaint is based on these facts:

Continued on the attached sheet.



Complainant's signature

Task Force Agent Angela R. Bunch, A.T.F.  
Printed name and title



Judge's signature

Hon. Kimberly Altman, U.S. Magistrate Judge  
Printed name and title

Date: February 9, 2021

City and state: Detroit, Michigan

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Angela Bunch, being duly sworn, depose and state the following:

**I. INTRODUCTION**

1. I am a member of the Detroit Police Department and have been for twenty-two years. Since 2013, I have been assigned to the Firearms Investigative Team with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). I became a Task Force Officer with the ATF in May of 2014. I have a Bachelors of Applied Science. I have been involved in numerous investigations related to violations of federal firearm and narcotic laws.

2. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all the information known to law enforcement related to this investigation.

3. I am currently investigating Vincent Lamar CLARK, date of birth xx/xx/1979, for being a felon in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1).

4. I reviewed a computer printout of CLARK’s criminal history (“CCH”). CLARK has the following convictions:

- a. 1997 - felony – weapons – receiving and concealing; 20th Circuit Court – Ottawa County; and
- b. 2005 - felony – armed robbery; 20th Circuit Court – Ottawa County.

## **II. SUMMARY OF THE INVESTIGATION**

5. On August 29, 2020, at approximately 5:45 p.m., Detroit police officers entered the Sunoco gas station at 15201 E. 7 Mile, in the city of Detroit. They observed a male, later identified as Vincent CLARK, exiting the location. Officers visually observed part of the handle of a black handgun sticking out of CLARK's left pocket.

6. Just before CLARK began to enter his vehicle at pump number one, Officers approached him and asked if he possessed a concealed pistol license (CPL). CLARK stated he was open carrying.

7. CLARK was detained, and a handgun removed from his pocket. CLARK does not have a CPL, and was advised that open carry cannot be concealed.

8. The officers recovered a Canick, .9mm, model TP9SF, handgun with magazine and ammunition.

9. CLARK was arrested and transported to the Detroit Detention Center.

10. I contacted ATF Special Agent Michael Jacobs, an expert in the Interstate Nexus of firearms. Agent Jacobs stated that the firearm, based on the description provided, without physically examining it, was manufactured outside the State of Michigan and therefore traveled in and affected interstate commerce.

11. On or about May 9, 2005, CLARK was sentenced to ten and half years to fifty years for multiple counts of armed robbery and felony firearm. Based on his sentence, probable cause exists that CLARK is aware that he was a convicted felon at the time he possessed the aforementioned firearm.

### III. CONCLUSION

12. Probable cause exists that Vincent CLARKE, a convicted felon, did knowingly and intentionally possess a firearm, which traveled in and affected interstate commerce, in violation of Title 18 U.S.C. § 922(g)(1).



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Task Force Officer Angela R. Bunch  
Bureau of Alcohol, Tobacco, Firearms and  
Explosives

Sworn to before me and signed in my  
presence and/or by reliable electronic means.



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HON. KIMBERLY ALTMAN  
UNITED STATES MAGISTRATE JUDGE

February 9, 2021